



3. **Proposed Pretrial Schedule:** The parties have agreed on all dates for the following pretrial schedule.

- a. Automatic discovery disclosures will be completed on or before December 30, 2004.
- b. Supplemental or amended pleadings shall be filed on or before January 31, 2005.
- c. Written discovery (interrogatories, requests for production of documents) shall be served on or before March 31, 2005, responses to be served on or before May 1, 2005.
- d. Non-expert depositions shall be completed on or before August 1, 2005.
- e. Plaintiff's expert witnesses shall be designated, and Rule 26(a)(2) information provided to defendant, by July 15, 2005.
- f. Defendant's expert witnesses shall be designated, and Rule 26(a)(2) information provided to plaintiff, by August 15, 2005.
- g. All expert witness depositions shall be completed by September 15, 2005.
- h. Motions for Summary Judgment shall be filed on or before September 30, 2005. Any Opposition shall be filed on or before October 31, 2005. Any Reply to Opposition shall be filed on or before November 21, 2005.

4. **Trial by Magistrate Judge**

The parties consent to trial by Magistrate Judge.

5. **Rule 16.1(D) (3) Certifications**

The parties are submitting separately their certifications regarding consultation on litigation budgets and alternative dispute resolution as required by Local Rule 16.1(D) (3).

PATRICIA WASHINGTON

SPRINGFIELD COLLEGE

By her attorney,

By its attorneys,

/s/ Suzanne Garrow

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Dated: December 1, 2004